

REMARKS**Administrative Overview**

Claims 1, 3-9, 12, 13, 15-19 and 22-29 were presented for examination. Claims 1, 3-5, 9, 12, 13, 15-17, and 22-27 were rejected under 35 U.S.C. 103(a) as obvious over U.S. Patent No. 6,094,662 to Hawes ("Hawes") in view of U.S. Patent No. 6,192,382 to Lafer et al. ("Lafer"). Claims 6-8, 18, 19, 28, and 29 were rejected under 35 U.S.C. 103(a) as obvious over Hawes and Lafer as applied to claims 1, 12, 22, and 23, and further in view of U.S. Patent No. 6,112,242 to Jois et al. ("Jois"). Applicant hereby amends claims 1, 6, 12, 18, 22, and 28. Upon entry of this amendment, claims 1, 3-9, 12, 13, 15-19, and 22-29 are presented for examination.

Applicants note the Examiner's consideration of the Fifth Supplemental Information Disclosure Statement submitted on August 13, 2004. Applicants submit herewith a Sixth Supplemental Information Disclosure Statement with the present amendment.

Rejection of claims 1, 3-5, 9, 12, 13, 15-17, and 22-27 under 35 U.S.C. 103(a)

Claims 1, 3-5, 9, 12, 13, 15-17, and 22-27 were rejected as obvious over Hawes in view of Lafer. To establish a prima facie case of obviousness with respect to a claim, it is necessary that the prior art references, either alone or in combination, teach or suggest each and every limitation of the rejected claims. Applicants respectfully submit that Hawes in combination with Lafer does not teach or suggest all the elements of claims 1, 3-5, 9, 12, 13, 15-17, and 22-27.

Independent claims 1, 12, and 22 all include the element of transmitting to the client the modified version of one of the plurality of dynamic portions and an identifier specifying one of the plurality of dynamic portions of the displayed page to be replaced by the modified versions of one of the dynamic portions. In other words, changes are made directly to portions of the displayed page; an entire new page is NOT generated in order to update the display.

In contrast, Hawes describes a system in which a complete new page is formed when modifications occur. Hawes describes a web page having non-cacheable HTML portions and cacheable graphic portions. At col. 6, lines 64-66, Hawes discusses the steps to be performed when a web page is refreshed, which includes combining re-retrieved non-cacheable portions of

the page with the cached portions of the page to form a complete web page. Accordingly, Hawes does not suggest transmitting an identifier specifying one of the plurality of dynamic portions of the displayed page to be replaced by modified versions of one of the dynamic portions. At col. 5, lines 52-26, Hawes discusses that the reload status or the refresh button requests retransmission of the non-cached portions of the web page, and that the cached portions are reloaded into the display. As Hawes pointed out, the cached portions are portions that have not been changed since the last update of the webpage; however, Hawes still requires reloading of the non-changed portions into the display to form a complete web page to be displayed. Therefore, Applicants respectfully submit that Hawes neither teaches nor suggests transmitting an identifier specifying one of the plurality of dynamic portions of the displayed page to be replaced by modified versions of one of the dynamic portions.

Lafer also fails to teach or suggest transmitting an identifier specifying one of the plurality of dynamic portions of the displayed page to be replaced by modified versions of one of the dynamic portions. Lafer describes a method and system for web page construction using tags and caching of HTML fragments. Like the systems described in Hawes, Lafer requires forming a complete web page before it is displayed. At col. 2, lines 1-3, Lafer discusses that each tag embedded in an HTML document is replaced with associated HTML fragment(s) during construction of a requested HTML file. Therefore, Lafer also does not teach or suggest transmitting an identifier specifying one of the plurality of dynamic portions of the displayed page to be replaced by modified versions of one of the dynamic portions.

Accordingly, Applicants respectfully submit that Hawes and Lafer, alone or in combination, do not teach or suggest all the elements recited by independent claims 1, 12, and 22, as amended. Applicants respectfully request the Examiner to reconsider and withdraw the rejection of independent claims 1, 12, and 22 and their dependent claims 3-5, 9, 13, 15-17, and 23-27, which depend from those independent claims.

Rejection of claims 6-8, 18, 19, 28, and 29 under 35 U.S.C. 103 (a)

Claims 6-8, 18, 19, 28, and 29 were rejected as obvious over Hawes and Lafer as applied to claims 1, 12, 22, and 23, and further in view of Jois. Applicants respectfully traverse this rejection.

The arguments set forth above regarding the failure of Hawes and Lafer to teach or suggest transmitting an identifier specifying one of the plurality of dynamic portions of the displayed page to be replaced by modified versions of one of the dynamic portions, as recited by independent claims 1, 12, and 22, as amended, apply with equal force here and are reiterated as if set forth in full. Jois fails to cure the deficiencies of Hawes and Lafer. Specifically, Jois also fails to teach the element of making changes directly to a displayed page without creating a whole new page for display. At col. 4 lines 25-37, whether it is a request for a “Flat-File” web page or a request to execute a CGI program, the retrieved or newly formed web page is returned to the client where it is displayed in place of the last web page. Therefore, Jois does not teach or suggest making changes directly to a displayed page.

Accordingly, Applicants respectfully submit that the combination of Hawes, Lafer, and Jois fails to teach or suggest every element of independent claims 1, 12, and 22, as amended. Claims 6-8, 18, 19, 28 and 29 depend from one of the independent claims 1, 12, and 22, and therefore include all the limitations of their corresponding independent claims. Accordingly, Applicants respectfully request Examiner to reconsider and withdraw the rejections of claims 6-8, 18, 19, 28, and 29.

CONCLUSION

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. CXT-054 from which the undersigned is authorized to draw.

Dated: January 19, 2005

Respectfully submitted,

By 

John D. Lanza

Registration No.: 40,060

LAHIVE & COCKFIELD, LLP

28 State Street

Boston, Massachusetts 02109

(617) 227-7400

(617) 742-4214 (Fax)

Attorney For Applicant